

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

Eliseo Rivera Cortés, Gloria Pillot, et al,

*Plaintiffs*

v.

Airport Catering Services, Corp.,  
Union Independiente de Trabajadores  
de Aeropuertos

*Defendants*

Civil No. 98-2092(GG)

CIVIL ACTION

**SECOND MOTION IN COMPLIANCE WITH ORDER**

TO THE HONORABLE COURT:

Comes now Co-Defendant, Airport Catering Services Corp., hereinafter referred to as ACS, represented by its undersigned attorneys and very respectfully states and prays as follows:

1. As ordered by this Honorable Court on its November 8, 2004, Order, the appearing party hereby encloses the following documents with their corresponding certified translation in English:

a. Transaction and Release Agreement (Acuerdo de Transacción Y Relevó)- entered to by ACS and Eliseo Rivera Cortés on September 28, 1995.

b. Notice of Dismissal of Charge (Aviso de Desestimación de Cargo), emitted by the P.R. Labor Relations Board on February 6, 1998, on case No. CA-97-91

c. Certification (Certificación)- emitted by the P.R. Labor Relations Board on October 28, 2002, in cases No. CA-97-91 and CA-97-90.

d. Resolution (Resolución)- emitted by the P.R. Labor Relations Board on October 20, 1998, in cases No. CA-97-91 and CA-97-90.

e. Order for Consolidation (Orden de Consolidación)- emitted by the P.R. Labor Relations Board on September 9, 1998, in cases No. CA-97-91 and CA-97-90.

f. Notice of Filing of “Notice of Removal” to the U.S. District Court (Aviso de Presentación de Notificación de Traslado al Tribunal Federal de Distrito)- filed by ACS before the P.R. Labor Relations Board on September 31, 1998, in case No. CA-97-90.

g. Request for List of Complainants Involved in this Case (Solicitud de Listado de Los Querellantes Envueltos en el Presente Caso)- filed by ACS before the P.R. Labor Relations Board on October 7, 1998, in case No. CA-97-90.

h. Notice of Filing of “Notice of Removal” to the U.S. District Court (Aviso de Presentación de Notificación de Traslado al Tribunal Federal de Distrito)- filed by the Union before the P.R. Labor Relations Board on October 8, 1998, in case No. CA-97-91.

i. Resolution (Resolución)- emitted by the P.R. Labor Relations Board on October 20, 1998, in cases No. CA-97-91 and CA-97-90.

j. Motion (Moción)- filed by the Union before the P.R. Labor Relations Board on October 13, 1998, in case No. CA-97-91.

k. Request to Deem Allegations as Admitted (Solicitud Para que se Den por Admitidas las Alegaciones)- filed by Plaintiffs before the P.R. Labor Relations Board on October 6, 1998, in cases No. CA-97-91 and CA-97-90.

l. Resolution (Resolución)- emitted by the P.R. Labor Relations Board on October 2, 1998, in cases No. CA-97-91 and CA-97-90.

m. Motion Regarding Additional Professional Representation (Moción Sobre Representación Profesional Adicional)- filed by Juan R. Zalduondo y Frank Zorrilla Maldonado before the P.R. Labor Relations Board on September 15, 1998, in cases No. CA-97-91 and CA-97-90.

n. Complaint (Querella)- emitted by the P.R. Labor Relations Board on August 14, 1998, in cases No. CA-97-90.

o. Resolution (Resolución)- emitted by the P.R. Labor Relations Board on June 12, 1998, in cases No. CA-97-91.

p. Charge (Cargo)- filed by Eliseo Rivera Cortés before the P.R. Labor Relations Board on August 26, 1997, in case No. CA-97-90.

q. 1<sup>st</sup> Amendment Charge (1era Enmienda Cargo)- filed by Eliseo Rivera Cortés before the P.R. Labor Relations Board on September 23, 1997, in case No. CA-97-90.

r. Letter ACS (Carta ACS)- dated May 29, 1997.

WHEREFORE, we respectfully request from this Honorable Court to accept the herewith enclosed documents with their corresponding certified translation in English.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 3<sup>rd</sup> day of December, 2004.

I HEREBY CERTIFY that on December 3, 2004, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Luis R. Mellado-González, Esq.; José Carreras, Esq.; and Nereida Feliciano Ramos, Esq.

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